INSURANCE COMPANY
175 BERKELEY STREET
BOSTON, MASSACHUSETTS 02117



SDMS DocID

559690

JOHN E. MCMAHON SENIOR ATTORNEY

RECEIVED SEP 1 7 1988

(617) 357-9500

September 12, 1988

Superfund Records Center SITE: (Oakly BREAK: 11.9

U.S. Environmental Protection Agency P.O. Box 3409
Reston, Virginia 22091

Mr. Paul Marchessault

RE: Request for Information Pursuant to Section 104 of CERCLA and Section 3007 of RCRA for the Coakley Landfill Site in North Hampton, New Hampshire

Dear Mr. Marchessault:

Annexed hereto is the response of Liberty Mutual Insurance Company (Respondent) by counsel in the above captioned matter. Inquiries regarding this response are to be directed to the attention of the undersigned at Liberty Mutual Insurance Company, 225 Borthwick Avenue, Portsmouth, NH 03081 Mail Stop AD01

Yours truly

.E. McMahon, Esq.

cc: E.P.A. - J. Firestone, Esq , M.S. Hohman

State of New Hampshire - M. Robinette, M. Bernheim, Esq.

PAGE 1 OF 3

Request for Information Pursuant to Section 104 of CERCLA and Section 3007 of RCRA for the Coakley Landfill Site in North Hampton, New Hampshire

GENERAL INFORMATION

- John E. McMahon, Esq. Assistant Counsel Liberty Mutual Insurance Company 225 Borthwick Avenue Portsmouth, New Hampshire (603) 431-8400 ext 53182
- J. R. Calderwood Administrative Manager Portsmouth Liberty Mutual Insurance Company
 225 Borthwick Avenue Portsmouth, New Hampshire
 (603) 431-8400 ext 52101
 - J. Brownell Building Superintendent Liberty Mutual Insurance Company 225 Borthwick Avenue Portsmouth, New Hampshire (603) 431-8400 ext 53150
 - D.L. Anderson Manager Facilities Planning & Operations Liberty Mutual Insurance Company 13 Riverside Drive Weston, Massachusetts (617) 891-8900 ext 101
 - Edward T. Frackiewicz, Jr. Administrative Assistant to the Secretary

Liberty Mutual Insurance Company 175 Berkeley Street Boston, Massachusetts (617) 357-9500 ext 41620

- 3. Statutory form annual statement for Liberty Mutual Insurance Company for the year ending 12/31/87, page 2 and 3.
- 4. To Respondent's knowledge there are no such persons.
- 5. In light of the answers to questions 14 and 15 to Respondent's knowledge there are no such persons.

PAGE 2 OF 3

Request for Information Pursuant to Section 104 of CERCLA and Section 3007 of RCRA for the Coakley Landfill Site in North Hampton, New Hampshire

- 6. See response 2.
- 7. To Respondent's knowledge there have been no previous requests and thus no previous answers.

FINANCIAL/CORPORATE INFORMATION

8. Liberty Mutual Insurance Company

Gary L. Countryman
President and Chief Executive Officer
Liberty Mutual Insurance Company
175 Berkeley Street,
Boston, Massachusetts

- 9. Liberty Mutual is not a subsidiary of any other corporation.
- 10. Liberty Mutual Insurance Company is incorporated under the laws of the Commonwealth of Massachusetts.

The agent for service of process of suits against Liberty Mutual is Mr. Stephen W. Keene Secretary
Liberty Mutual Insurance Company
175 Berkeley Street
Boston, Massachusetts.

11. Liberty Mutual Insurance Company is an insurer marketing workers compensation, property/casualty and other lines of insurance directly and through various subsidiaries and affiliates to businesses and individuals in the United States and internationally.

The facility at 225 Borthwick Avenue is the primary computer programming and computer processing center of the company.

12. Information responsive to this question has been requested and will be supplied in a supplementary answer.

PAGE 3 OF 3

Request for Information Pursuant to Section 104 of CERCLA and Section 3007 of RCRA for the Coakley Landfill Site in North Hampton, New Hampshire

- 13. As of 12/31/87 the assets of Liberty Mutual Insurance Company were: \$ 12,187,169,212 .00; and as of the same date the liabilities were: \$ 10,239,998,630 .00.
- 14. Based upon such records as are available to Respondent the answer is no.
- 15. Based upon such records as are available to Respondent the answer is no.

ANNUAL STATEMENT FOR THE YEAR 1987 OF THE LIBERTY MUTUAL INSURANCE COMPANY

ASSETS

| | 1 | 2 |
|---|--------------------|----------------|
| | Current Year | Previous Year |
| , | | |
| 1. Bonds (less 50 liability for asset transfers with put options) | B,151,530,429 | 6,671,120,559 |
| 2. Stocks: | | • |
| 2.1 Preferred stocks | 9,897,674 | 11,159,181 |
| 2.2 Camean stacks | 738,947 621 | 710.271.592 |
| : 3. Mortgage loans on real estate | . 0 | 0 |
| 1 4. Real estate: | • | |
| 1 4.1 Properties occupied by the company (less 50 encumbrances) | 71,458,677 | 64,450,321 |
| 1 4.2 Other properties (less so encuabrances) | 0 | |
| 1 5. Collateral loans | | • |
| 6.1 Cash on hand and on deposit | 40,172,232 | 33,801,651 |
| 1 6.2 Short-term investments | : | 1 |
| : 7. Other invested assets | 1 | 1 |
| : 8. Aggregate write-ins for invested assets | 1 | ,, |
| | 1 | |
| Ba. Subtotals, cash and invested assets (Items 1 to 8) | 9,583,193,280 | 8,067,250,419 |
| : 9. Agents' balances or uncollected premiums: | | |
| 9.1 Presiums and agents' balances in course of collection | 512,931,423 | 274,629,987 |
| 9.2 Premiums, agents' balances and installments booked but deferred and not yet due | 1,793,711,069 | 1,787,593,099 |
| 110. Funds held by or deposited with reinsured companies | 552,834 | 296,486 |
| 111. Notes receivable, taken for premiums | • | 0 |
| 112. Reinsurance recoverable on loss payments | 71,995,405 | 30,137,536 |
| 113. Federal income tas recoverable | 3,334,266 | 11,846,581 |
| il4. Electronic data processing equipment | 0 | : : 0 |
| : 15. Interest, dividends, and real estate income due and accrued | 1 148,792,830 | 122,185,678 |
| ilib. Recessable from parent, subsidiaries, and affiliates | 18,085,675 | 3,826,160 |
| : i17. Equities and deposits in pools and associations | ; .: 39,885,651 | 45,369,030 |
| il8. Amounts receivable relating to uninsured accident and health plans | .; 0 | : |
| : 120. Aggregate write-ins for assets other than invested assets | 14,686,779 | 17,872,990 |
| TOTALS (Illess & Alberta 20) | | |
| '21. TOTALS (Items 8s through 20) | 12,187,169,212 | 10,363,007,966 |
| : DETAILS OF WRITE-INS AGGREGATED AT ITEM B FOR INVESTED ASSETS : OBOI | | |
| ; 0802 | .1 | ! |
| : 0804 | | : ! |
| : OB98. Summary of remaining write-ins for Itcm 8 from Page 69 | 0 | • |
| 0899. TOTALS (Items 0801 thru 0805 plus 0898) (Page 2 Item 8) | .: 0 | · |
| IDETAILS OF WRITE-INS ABBREGATED AT ITEM 20 FOR OTHER THAM INVESTED ASSETS 1 2001. Investment cash in transit | 1 447.610 | I |
| : 2002. Other assets | 14,239,169 | |
| : 2004. : 2005. | .1 | |
| : 2098. Summary of remaining mrite-ins for Item 20 from Page 69 | 0 | • |
| 2099. TOTALS (Items 2001 thru 2005 plus 2098) (Page 2 Item 20) | 14 494 779 | 17 972 996 |

MOTE: The items on this page to agree with Exhibit 1, Col. 4. The Motes to Financial Statements are an integral part of this statement.

AMMUAL STATEMENT FOR THE YEAR 1987 OF THE LIBERTY MUTUAL INSURANCE COMPANY

LIABILITIES, SURPLUS AND OTHER FUNDS

| į | | 1 | 2 |
|---|--|---------------------------|---------------|
| : | | Current Year | Previous Year |
| 1. Losses (Part 3A. Col | ian 5, Itea 32) | 7 181 111 111 | |
| 2. Loss adjustment expe | oses (Part 3A, Column 6, Item 32) | 7.556.713.745 | 5 925,49 |
| 3. Contingent commissio | is and other similar charges | 14140 641, 320 3 | 907,49 |
| 4. Other expenses (excl | ding taxes, licenses and fees) | | |
| 5. Taxes, licenses and | ees (excluding federal and foreign income taxes) | 9,016,212 | 22,710 |
| federal and foreign | ncome taxes (excluding deferred taxes) | 1 | 78,572 |
| 7. Borrowed money | | 6.687.243 | 4,360 |
| 8. Interest. including | \$0 on borrowed money | | |
| 9. Ungarned premiums (Pa | rt 28, Column 7, Item 32) | : | |
| 10. Dividends declared an | d unpaid: | 913.764,240 1 | 1,314,960 |
| (a) Stockholders | | | |
| (b) Polscyholders | | į | |
| ii. Funds held by company | under reinsurance treaties | 20,694,980 | 56,449 |
| 2. Amounts withheld or r | tained by company for account of others | ! | |
| 13a. Unearned premiums on | Statement of the second of the | 13,433,679 | 2.328. |
| 3b. Reinsurance on paid | 3 | | |
| | \$61,192,252 : | | |
| unauthorized compa | ATTION TO THE PROPERTY OF THE | 1 | |
| | 1101001,027 | | |
| 3d. Less funds hold or one | llocated loss adjustment expenses recoverable from unauthorized companies \$4,726,597 | | |
| | per Schedule F, Part 2, Column 6 491,620,373 | : | |
| | zed reinsurance (Items 13m + 13m + 13c - 13d) | ; | |
| 5. Excess of statutory re | serves over statement reserves (Schedule P, Parts 1A, 1B, 1C, 10 and Schedule K) | b,585,530 | 5,882. |
| . Net adjustments in ass | ts and liabilities due to foreign exchange rates | | |
| 7. Drafts outstanding | | 18,811.000 | 21.033.0 |
| Payable to parent, sub- | iduaries and affiliates | 145,252,206 | 127,471.7 |
| . Payable for securities | | 248,458 | 15.976.6 |
| Liability for amounts) | eld under uninsured accident and health plans | | |
| Aggregate write-ins for | lightlities | | |
| | liabilities | 180,213,580 | 106,411,1 |
| Total liabilities (1 | leas I through 21) | 14 220 000 | **** |
| mggregate write-ins for | special surplus funds | 10.239,998,630 | 8,585,146,4 |
| Lomeon capital stock | *************************************** | 130,876,420 | 116,609.2 |
| referred capital stock | *************************************** | ! | |
| . Hydredate mrite-ins for | other than special surplus funds | <u> </u> | |
| . oross paid in and contri | buted surplus | 1.250,000 | 1,250,0 |
| . Unassigned funds (surpli | 51 | | |
| . Less treasury stock, at | rost: | 1,815,044,162 | 1.660.002,2 |
| m | so shares common (value included in Item 24A so) | | |
| (2) | AA abaaa aa da aa | į | |
| Surplus as regards polic | #0 shares greferred (value included in Item 24B \$0) | \ | |
| TOTALS (Page 2, Item | i | | . , |
| REERFERENSEERENSEERENSEERENSEERENSEERENSEERENSEERENSEERENSEERENSEERENSEERENSEERENSEERENSEERENSEERENSEERENSEEREN | T ITEM 21 FOR LIABILITIES | 12,187,169,212 | 10,363,007.96 |
| 1. Provision for federal tax | T ITEM 21 FOR LIABILITIES on unrealized capital gains | ************************ | ************* |
| VI | | 48.950,300 131,263,280 | 54.400.03 |
| ς | | 131,203,200 | 52.011.07 |
| or summary or remaining writ | e-ins for Item Zi from page 69 | | |
| ininca litera XIOI f | ru 2105 plus 2198) (Page 3, Item 211 | 0 : | |
| Provision for dividends | 11EH 23 FOR SPECIAL SURPLUS FUNDS | 180,213,580 | 106,411,100 |
| | TEM 23 FOR SPECIAL SURPLUS FUNDS it declared | 130.876.420 | 115.609,290 |
| | *************************************** | | ,, |
| . Summary of Lengthlind Milli | -ins for Itea 23 from page 69 | 1 | |
| . TOTALS (Items 2301 t) | ru 2305 plus 2398) (Page 3, Itea 23) | 0 | |
| LE OF WRITE-INS ASSREBATED AT | ITEN 24C FOR OTHER THAN SPECIAL SURPLUS FUNDS | 130,876,420 | 116,609,290 |
| 7 | 1 | 1,250,000 | |
| 4 | | 1,230,000 ; | 1.250.000 |
| B. Summary of remaining write | ins for Itee 24C from page 69 | | |
| TOTALS (Items 2400) t | PR 24005 along 240001 (Day 2) | 0 | ٥ |
| | ru 24CO5 plus 24C98) (Page 3, Item 24C) | | 1.250,000 |

Notice

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BOSTON, MA. SEPISION 2 4 0 1

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First Class Mail

FROM:

LIBERTY MUTUAL INSURANCE CO.

175 BERKELEY STREET
BOSTON, MASSACHUSETTS 02117

TO:

U.S. ENVIRONMENTAL PROTECTION AGENCY P.O. BOX 3409
RESTON, VIRGINIA 22091
ATTN: PAUL MARCHESSAULT

GF334

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